

**JUDGE COTE**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v. -

: INDICTMENT

HERNAN HURTADO,

: 11 Cr. **11 CRIM 928**

JUANA LOPEZ,

a/k/a "Juana Hurtado,"

FERNANDO CASTANEDA,

a/k/a "Fernando Castaneda

Hernandez,"

SHALEZA AZIZ,

a/k/a "Lisa Aziz," and

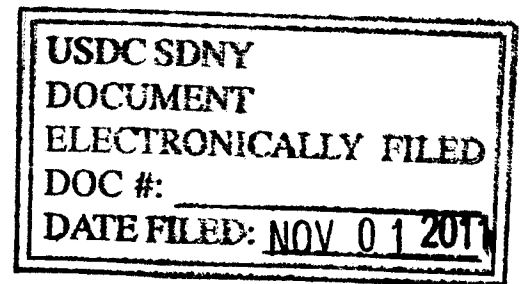
VANESSA RAMIREZ,

Defendants. :

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COUNT ONE

(Conspiracy)



The Grand Jury charges:

1. From at least in or about August 2009, up to and including in or about August 2011, in the Southern District of New York and elsewhere, HERNAN HURTADO, JUANA LOPEZ, FERNANDO CASTANEDA, a/k/a "Fernando Castaneda Hernandez," SHALEZA AZIZ, a/k/a "Lisa Aziz," and VANESSA RAMIREZ, the defendants, and others known and unknown, knowingly and willfully did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, mail fraud, in violation of Title 18, United States Code, Section 1341, and wire fraud, in violation of Title 18, United States Code, Section 1343.

2. It was a part and an object of the conspiracy that HERNAN HURTADO, JUANA LOPEZ, a/k/a "Juana Hurtado," FERNANDO CASTANEDA, a/k/a "Fernando Castaneda Hernandez," SHALEZA AZIZ, a/k/a "Lisa Aziz," and VANESSA RAMIREZ, the defendants, and others known and unknown, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, for the purpose of executing such scheme and artifice, would and did knowingly place in a post office and authorized depository for mail matter, a matter and thing to be sent and delivered by the Postal Service, and deposit and cause to be deposited a matter and thing to be sent and delivered by a private and commercial interstate carrier, and take and receive therefrom, such matter and thing, and cause to be delivered by mail and such carrier according to the direction thereon, and at the place at which it was directed to be delivered by the person to whom it was addressed, such matter and thing.

3. It was further a part and an object of the conspiracy that HERNAN HURTADO, JUANA LOPEZ, a/k/a "Juana Hurtado," FERNANDO CASTANEDA, a/k/a "Fernando Castaneda Hernandez," SHALEZA AZIZ, a/k/a "Lisa Aziz," and VANESSA RAMIREZ, the defendants, and others known and unknown, having devised and intending to devise a scheme and artifice to

defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did knowingly transmit and cause to be transmitted by means of wire, radio and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice.

Overt Acts

4. In furtherance of the conspiracy and to effect the illegal objects thereof, HERNAN HURTADO, JUANA LOPEZ, a/k/a "Juana Hurtado," FERNANDO CASTANEDA, a/k/a "Fernando Castaneda Hernandez," SHALEZA AZIZ, a/k/a "Lisa Aziz," and VANESSA RAMIREZ, the defendants, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about August 14, 2009, HERNAN HURTADO, the defendant, incorporated, and registered as the agent for, Direct Sales Times Shares Inc. in Florida.

b. In or about November 2009, HERNAN HURTADO, the defendant, hired a company to host a website called directtimesharesales.net.

c. On or about April 9, 2010, HERNAN HURTADO, the defendant, opened a bank account in the name of Direct Sales Times Shares Inc. at a bank in Florida.

d. In or about June 2010, HERNAN HURTADO, the defendant, hired a company to host a website called newyorkfinancialrecovery.com.

e. In or about October 2010, HERNAN HURTADO, the defendant, hired a company to host websites called ifmfirm.com and ifm-usa.net.

f. On or about November 16, 2010, JUANA LOPEZ, a/k/a "Juana Hurtado," the defendant, registered as the agent for IFM D.C Inc. in Florida and was listed as the president of the corporation on the incorporation documents.

g. In or about December 2010, a co-conspirator not named herein telephoned an individual in New York, New York and told her that there was a buyer for her time share.

h. On or about March 5, 2011, JUANA LOPEZ, a/k/a "Juana Hurtado," the defendant, opened a bank account in the name of IFM DC Inc. at a bank in Florida.

i. In or about January 2011, SHALEZA AZIZ, a/k/a "Lisa Aziz," the defendant, telephoned an individual in California and obtained a payment of \$5,000 from him.

j. On or about May 16, 2011, FERNANDO CASTANEDA, a/k/a "Fernando Castaneda Hernandez," the defendant, registered as the agent for Global Express Worldwide, LLC in Florida and was listed as the Manager of Global Express Worldwide, LLC on the organization documents.

k. On or about August 16, 2011, VANESSA RAMIREZ, the defendant opened a bank account in the name of USA Financial of America LLC at a bank in Florida.

(Title 18, United States Code, Section 1349.)

COUNT TWO

(Mail Fraud)

The Grand Jury further charges:

5. From at least in or about August 2009, up to and including in or about August 2011, in the Southern District of New York and elsewhere, HERNAN HURTADO, JUANA LOPEZ, a/k/a "Juana Hurtado," FERNANDO CASTANEDA, a/k/a "Fernando Castaneda Hernandez," SHALEZA AZIZ, a/k/a "Lisa Aziz," and VANESSA RAMIREZ, the defendants, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, for the purpose of executing such scheme and artifice and attempting so to do, knowingly did place in a post office and authorized depository for mail matter, a matter and thing to be sent and delivered by the Postal Service, and did deposit and cause to be deposited a matter and thing to be sent and delivered by private and commercial interstate carrier, and did take and receive therefrom, such matter and thing, and did cause to be delivered by mail and such carrier

according to the direction thereon, and at the place at which it was directed to be delivered by the person to whom it was addressed, such matter and thing, to wit, HURTADO, LOPEZ, CASTANEDA, AZIZ, and RAMIREZ, having devised a scheme to defraud sellers of time shares by charging them fees in connection with purported, but non-existent, sales of such time shares, caused documents to be delivered by mail and Federal Express for the purpose of executing such scheme.

(Title 18, United States Code, Sections 1341 and 2.)

COUNT THREE

The Grand Jury further charges:

6. From at least in or about August 2009, up to and including in or about August 2011, in the Southern District of New York and elsewhere, HERNAN HURTADO, JUANA LOPEZ, a/k/a "Juana Hurtado," FERNANDO CASTANEDA, a/k/a "Fernando Castaneda Hernandez," SHALEZA AZIZ, a/k/a "Lisa Aziz," and VANESSA RAMIREZ, the defendants, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, knowingly transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of

executing such scheme and artifice, to wit, HURTADO, LOPEZ, CASTANEDA, AZIZ, and RAMIREZ, having devised a scheme to defraud the sellers of time shares by charging them fees in connection with purported, but non-existent, sales of such time shares, caused interstate facsimiles and emails to be sent, and interstate telephone calls to be made, for the purpose of executing such scheme.

(Title 18, United States Code, Sections 1343 and 2.)

#### FORFEITURE ALLEGATION

7. As the result of committing one or more of the wire fraud, mail fraud and conspiracy offenses, in violation of Title 18, United States Code, Sections 1341, 1343 and 1349, alleged in Counts One, Two, and Three of this Indictment, HERNAN HURTADO, JUANA LOPEZ, a/k/a "Juana Hurtado," FERNANDO CASTANEDA, a/k/a "Fernando Castaneda Hernandez," SHALEZA AZIZ, a/k/a "Lisa Aziz," and VANESSA RAMIREZ, the defendants, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real and personal, which constitutes and is derived from proceeds traceable to the offenses.

#### Substitute Assets Provision

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendants -

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value;

or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

(Title 18, United States Code, Sections 981, 1341, 1343, 1349; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

FOREPERSON



PREET BHARARA

United States Attorney





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SOUTHERN DISTRICT OF NEW YORK

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SHALEZA AZIZ, a/k/a "Lisa Aziz," and  
VANESSA RAMIREZ,

Defendants.

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INDICTMENT

11 Cr.

(18 U.S.C. §§ 1341, 1343, 1349, and 2.)

PREET BHARARA

United States Attorney.

A TRUE BILL



Foreperson.

11/1/2011 - Filed Indictment - Case Assigned to Judge Cote.  
JH

J. Peck  
USMJ